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September 23, 2005

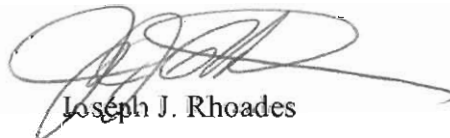
The Honorable Joseph J. Farnan, Jr.
United States District Ct.
District of Delaware
844 King St., Lock Box 27
Wilmington, DE 19801

RE: Crowell v. Pace International Union Local 2-0770
C.A. No. 04-259

Dear Judge Farnan:

Enclosed please find a letter, submitted on behalf of Pace International, in the above-captioned matter.

Respectfully yours,


Joseph J. Rhoades

JJR/cm

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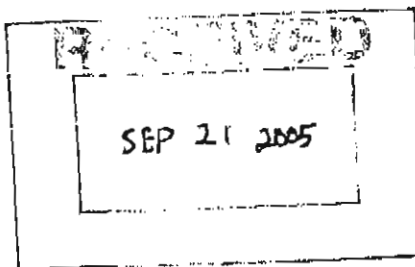
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215-875-3129
September 20, 2005

The Honorable Joseph J. Farnan, Jr.
United States District Court
District of Delaware
844 King Street, Lock Box 27
Wilmington, DE 19801



File No. 3-770-11

Re: **Crowell v. Pace International Union Local 2-0770**
C.A. No. 04-259

Dear Judge Farnan:

In response to Barry Willoughby's letter to you of September 16, 2005, the Union disagrees with the Employer's contention that the Union's Motion for Relief from the Court's judgment in this matter is moot. Although the Union did file a protective grievance, which is now scheduled for arbitration on November 22, 2005, concerning whether Robert Blisard is entitled to remedial relief, that action was taken solely to provide an alternative mechanism to obtain relief in the event that the Court should decline to grant the Union's pending motion.

Contrary to the Employer's contention that the motion is moot, should the Court grant the requested relief, it is the arbitration that would become moot. The Union firmly believes that its motion for relief from the Court is justified; however, should the Court determine that the arbitration takes precedence, Local 770 requests that the Court retain jurisdiction pending the outcome of that arbitration.

Respectfully,

Thomas H. Kohn
THOMAS H. KOHN

THK/sdk

cc: Barry Willoughby, Esquire
Carl Jones